

EXHIBIT “C”

AFFIDAVIT

STATE OF NEW YORK)

: ss.:

COUNTY OF SUFFOLK)

I, Yonis Reyes being duly sworn, says:

1. I am a resident of the State of New York and am over 18 years of age.
2. For the period for Defendants on or about April 2, 2015. I worked full time for the defendants until my employment with them came to an end.
3. My employment with the Defendants came to an end on or about December 25, 2015.
4. As a full time construction worker I routinely worked as a laborer on both private and prevailing wage projects.
5. I and the other construction workers for defendants routinely 6 days per week. As such, we worked in excess of 40 forty hours per week. However, we were not paid overtime.
6. I usually began work at 6:30 a.m. and would finish my work day at 5:00. Sometime even later if the job was not finished.
7. During, my employment with defendants I was paid an hourly rate of \$12.00 per hour.
8. The overtime hours were paid in cash at the straight time rate.
9. Throughout my employment with defendants I worked on prevailing wage projects. However, the defendants did not pay me the prevailing wage rate for hour spent on the public works projects.

10. Instead, defendants would pay me my regular salary irrespective if it was a public works project.

11. Throughout my employment I and similarly situated employees worked a sixteen hours per month on prevailing wage projects. Among the projects we worked on were Half Hollow Hills Library, The West Babylon UFSD Garage, West Babylon UFSD parking lot, the West Babylon Junior High School East and West, West Babylon UFSD High School, West Babylon Junior High School, West Babylon UFSD Forest Ave Elementary School and South Bay Elementary School, to name a few.

12. The defendants have historically engaged in wage and hour violations by denying its workers overtime pay at the rate of time and a half as required by state and federal law and not paying prevailing wage rate on public works projects.

Sworn to before me this
17 the day of August, 2020

Notary Public


YONIS REYES

DELVIS MELENDEZ
Notary Public, State of New York
Qualified in Queens County
No. 02ME5087119
Commission Expires Oct. 27, 2021

AFFIDAVIT

STATE OF NEW YORK)

: ss.:

COUNTY OF SUFFOLK)

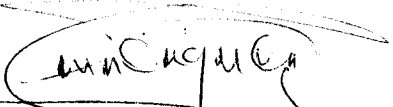
I, Manuel Campos being duly sworn, says:

1. I am a resident of the State of New York and am over 18 years of age.
2. For the period for Defendants on or about April 15, 2016. I worked full time for the defendants until my employment with them came to an end.
3. My employment with the Defendants came to an end on or about July 15, 2018.
4. As a full time construction worker I routinely worked as an asphalt raker on both private and prevailing wage projects.
5. I and the other construction workers for defendants routinely 6 days per week. As such, we worked in excess of 40 forty hours per week. However, we were not paid overtime.
6. I usually began work at 6:30 a.m. and would finish my work day at 5:00. Sometime even later if the job was not finished.
7. During, my employment with defendants I was paid an hourly rate of \$14.00 to \$15.00 per hour, depending on the year.
8. The overtime hours were paid in cash at the straight time rate.
9. Throughout my employment with defendants I worked on prevailing wage projects. However, the defendants did not pay me the prevailing wage rate for hour spent on the public works projects.

10. Instead, defendants would pay me my regular salary irrespective if it was a public works project.

11. Throughout my employment I and similarly situated employees worked a minimum of sixteen hours per month on prevailing wage projects. Among the projects we worked on were Half Hollow Hills Library, The West Babylon UFSD Garage, West Babylon UFSD parking lot, the West Babylon Junior High School East and West, West Babylon UFSD High School, West Babylon UFSD Forest Ave Elementary School and South Bay Elementary School, to name a few.

12. The defendants have historically engaged in wage and hour violations by denying its workers overtime pay at the rate of time and a half as required by state and federal law and not paying prevailing wage rate on public works projects.


MANUEL CAMPOS

Sworn to before me this
17th day of August, 2020


Notary Public

DILVIS MELENDEZ
Notary Public, State of New York
Qualified in Queens County
No. 02ME5087119
Commission Expires Oct. 27, 2021

AFFIDAVIT

STATE OF NEW YORK)

: ss.:

COUNTY OF SUFFOLK)

I, Ferdis Delgado being duly sworn, says:

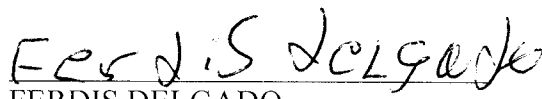
1. I am a resident of the State of New York and am over 18 years of age.
2. For the period for Defendants on or about 2012, I worked full time for the defendants until my employment with them came to an end.
3. My employment with the Defendants came to an end on or about May 2018.
4. As, a full time construction worker, I routinely operated the tractor and/or bobcat on the paving jobs on both private and prevailing wage projects.
5. I and the other construction workers for defendants routinely 6 days per week. As such, we worked in excess of 40 forty hours per week. However, we were not paid overtime.
6. I usually began work at 6:30 a.m. and would finish my work day at 5:00. Sometime even later if the job was not finished.
7. During, the last six years of my employment with defendants, I was paid an hourly rate of \$17.00 to \$20.00 per hour, depending on the year.
8. The overtime hours were paid in cash at the straight time rate.
9. Throughout my employment with defendants I worked on prevailing wage projects. However, the defendants did not pay me the prevailing wage rate for hour spent on the public works projects.

10. Instead, defendants would pay me my regular salary irrespective if it was a public works project.

11. Throughout my employment I and similarly situated employees worked a minimum of sixteen hours per month on prevailing wage projects. Among the projects we worked on were Half Hollow Hills Library, The West Babylon UFSD Garage, West Babylon UFSD parking lot, the West Babylon Junior High School East and West, West Babylon UFSD High School, West Babylon Junior High School, West Babylon UFSD Forest Ave Elementary School and South Bay Elementary School, to name a few.

12. When I worked on public works projects I usually operated the bobcat and tractors.

13. The defendants have historically engaged in wage and hour violations by denying its workers overtime pay at the rate of time and a half as required by state and federal law and not paying prevailing wage rate on public works projects.


FERDIS DELGADO

Sworn to before me this
14 the day of August, 2020


Notary Public

LILVIS MELENDEZ
Notary Public, State of New York
Qualified in Queens County
No. 02ME6067119
Commission Expires Oct. 27, 2021

AFFIDAVIT

STATE OF NEW YORK)

: ss.:

COUNTY OF SUFFOLK)

I, Santos Hernandez being duly sworn, says:

1. I am a resident of the State of New York and am over 18 years of age.
2. For the period for Defendants on or about 2006. I worked full time for the defendants until my employment with them came to an end.
3. My employment with the Defendants came to an end on or about July 16, 2018.
4. As, a full time construction worker, I routinely operated the paver, tractor and roller on the paving jobs on both private and prevailing wage projects.
5. I and the other construction workers for defendants routinely 6 days per week. As such, we worked in excess of 40 forty hours per week. However, we were not paid overtime.
6. I usually began work at 6:30 a.m. and would finish my work day at 5:00. Sometime even later if the job was not finished.
7. During, the last six years of my employment with defendants, I was paid an hourly rate ranging from \$12.50 to \$22.00 per hour.
8. The overtime hours were paid in cash at the straight time rate.
9. Throughout my employment with defendants I worked on prevailing wage projects. However, the defendants did not pay me the prevailing wage rate for hour spent on the public works projects.

10. Instead, defendants would pay me my regular salary irrespective if it was a public works project.

11. Throughout my employment I and similarly situated employees worked a minimum of sixteen hours per month on prevailing wage projects. Among the projects we worked on were Half Hollow Hills Library, The West Babylon UFSD Garage, West Babylon UFSD parking lot, the West Babylon Junior High School East and West, West Babylon UFSD High School, West Babylon UFSD Forest Ave Elementary School and South Bay Elementary School, to name a few.

12. When I worked on the public works projected I operated the paver, tractors and the bobcat.

13. The defendants have historically engaged in wage and hour violations by denying its workers overtime pay at the rate of time and a half as required by state and federal law and not paying prevailing wage rate on public works projects.

Santos Hernandez
SANTOS HERNANDEZ

Sworn to before me this
16th day of August, 2020

[Signature]
Notary Public

DELVIS HERNANDEZ
Notary Public, State of New York
Qualified in Queens County
No. 02ME5087119
Commission Expires Oct. 27, 2022

AFFIDAVIT

STATE OF NEW YORK)

: ss.:

COUNTY OF SUFFOLK)


I, Ivan Delgado being duly sworn, says:

1. I am a resident of the State of New York and am over 18 years of age.
2. For the period for Defendants on or about April 17, 2014. I worked full time for the defendants until my employment with them came to an end.
3. My employment with the Defendants came to an end on or about April 15, 2016.
4. As a full time construction worker I routinely worked as a driver on both private and prevailing wage projects.
5. I and the other construction workers for defendants routinely 6 days per week. As such, we worked in excess of 40 forty hours per week. However, we were not paid overtime.
6. I usually began work at 6:30 a.m. and would finish my work day at 5:00. Sometime even later if the job was not finished.
7. During, my employment with defendants I was paid an hourly rate of \$25.00 per hour.
8. The overtime hours were paid in cash at the straight time rate.
9. Throughout my employment with defendants I worked on prevailing wage projects. However, the defendants did not pay me the prevailing wage rate for hour spent on the public works projects.

10. Instead, defendants would pay me my regular salary irrespective if it was a public works project.

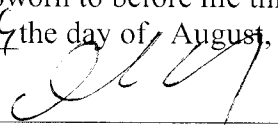
11. Throughout my employment I and similarly situated employees worked a minimum of sixteen hours per month on prevailing wage projects. Among the projects we worked on were Half Hollow Hills Library, The West Babylon UFSD Garage, West Babylon UFSD parking lot, the West Babylon Junior High School East and West, West Babylon UFSD High School, West Babylon UFSD Forest Ave Elementary School and South Bay Elementary School, to name a few.

12. The defendants have historically engaged in wage and hour violations by denying its workers overtime pay at the rate of time and a half as required by state and federal law and not paying prevailing wage rate on public works projects.



IVAN DELGADO

Sworn to before me this
14th day of August, 2020



Notary Public

DELVIS MELENDEZ
Notary Public, State of New York
Qualified in Queens County
No. 02ME5087119
Commission Expires Oct. 27, 2021

AFFIDAVIT

STATE OF NEW YORK)

: ss.:

COUNTY OF SUFFOLK)

I, Manuel Tenecela Nieves being duly sworn, says:

1. I am a resident of the State of New York and am over 18 years of age.
2. For the period for Defendants on or about July 11, 2014. I worked full time for the defendants until my employment with them came to an end.
3. My employment with the Defendants came to an end on or about May 18, 2018.
4. As a full time construction worker I routinely worked as a mason on both private and prevailing wage projects.
5. I and the other construction workers for defendants routinely 6 days per week. As such, we worked in excess of 40 forty hours per week. However, we were not paid overtime.
6. I usually began work at 6:30 a.m. and would finish my work day at 5:00. Sometime even later if the job was not finished.
7. During, my employment with defendants I was paid an hourly rate of \$14.00 to \$19.00 dollars per hour, depending on the year.
8. The overtime hours were paid in cash at the straight time rate.
9. Throughout my employment with defendants I worked on prevailing wage projects. However, the defendants did not pay me the prevailing wage rate for hour spent on the public works projects.

10. Instead, defendants would pay me my regular salary irrespective if it was a public works project.

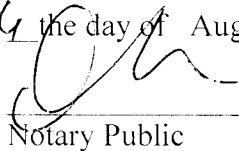
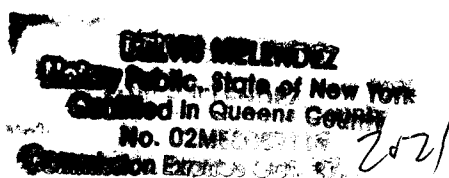
11. Throughout my employment I and similarly situated employees worked a minimum of sixteen hours per month on prevailing wage projects. Among the projects we worked on were Half Hollow Hills Library, The West Babylon UFSD Garage, West Babylon UFSD parking lot, the West Babylon Junior High School East and West, West Babylon UFSD High School, West Babylon UFSD Forest Ave Elementary School and South Bay Elementary School, to name a few.

12. The defendants have historically engaged in wage and hour violations by denying its workers overtime pay at the rate of time and a half as required by state and federal law and not paying prevailing wage rate on public works projects.



MANUEL TENECELA NIEVES

Sworn to before me this
14th the day of August, 2020


Notary Public

AFFIDAVIT

STATE OF NEW YORK)

: ss.:

COUNTY OF SUFFOLK)

I, Wilmer Reyes being duly sworn, says:

1. I am a resident of the State of New York and am over 18 years of age.
2. For the period for Defendants on or about April 5, 2013. I worked full time for the defendants until my employment with them came to an end.
3. My employment with the Defendants came to an end on or about December 20, 2018.
4. As a full time construction worker I routinely operated the raker on both private and prevailing wage projects.
5. I and the other construction workers for defendants routinely 6 days per week. As such, we worked in excess of 40 forty hours per week. However, we were not paid overtime.
6. I usually began work at 6:30 a.m. and would finish my work day at 5:00. Sometime even later if the job was not finished.
7. During, my employment with defendants I was paid an hourly rate of \$12.00 to \$20.00 dollars per hour, depending on the year.
8. The overtime hours were paid in cash at the straight time rate.
9. Throughout my employment with defendants I worked on prevailing wage projects. However, the defendants did not pay me the prevailing wage rate for hour spent on the public works projects.

10. Instead, defendants would pay me my regular salary irrespective if it was a public works project.

11. Throughout my employment I and similarly situated employees worked a minimum of sixteen hours per month on prevailing wage projects. Among the projects we worked on were Half Hollow Hills Library, The West Babylon UFSD Garage, West Babylon UFSD parking lot, the West Babylon Junior High School East and West, West Babylon UFSD High School, West Babylon UFSD Forest Ave Elementary School and South Bay Elementary School, to name a few.

12. The defendants have historically engaged in wage and hour violations by denying its workers overtime pay at the rate of time and a half as required by state and federal law and not paying prevailing wage rate on public works projects.

Wilmer Reyes
WILMER REYES

Sworn to before me this
16th the day of August, 2020

[Signature]
Notary Public

